<u>REMARKS</u>

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-24 are currently pending, with Claims 1-8 and 15-20 withdrawn as directed to non-elected inventions. Claims 9, 14, 22, and 24 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 9-14 and 21-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,684,715 to <u>Palmer</u> (hereinafter "the '715 patent") in view of U.S. Patent No. 6,404,901 to <u>Itokawa</u> (hereinafter "the '901 patent") and U.S. Patent No. 6,564,263 to <u>Bergman et al.</u> (hereinafter "the '263 patent").

Amended Claim 9 is directed to a video data description method, comprising: (1) extracting feature data of a predetermined object and feature data of a background area from a frame of an input video; (2) describing the feature data of the predetermined object and the feature data of the background area as a descriptor of the frame, the feature data of the predetermined object including *an affine transformation coefficient of an area of a predetermined object*, wherein the affine transformation coefficient is estimated based on movement of the predetermined object, which is approximated by an affine transformation model; and (3) attaching the descriptor to the frame. Claim 9 has been amended to clarify that the feature data of the predetermined object includes *an affine transformation coefficient of an area of the predetermined object*. The changes to Claim 9 are supported by the originally filed specification and do not add new matter.[1]

Applicants respectfully submit that the rejection of Claim 9 (and dependent Claims 11-13, 21, and 22) is rendered moot by the present amendment to Claim 9.

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[1] See, e.g., Figures 10B and 10C and the description related thereto in the specification. See also page 18 of the specification.

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Regarding the rejection of Claim 9, the Office Action asserts that the '715 patent discloses everything in Claim 9 with the exception of extracting feature data of a background area from a frame, and relies on the '901 and '263 patents to remedy that deficiency.

The '715 patent is directed to an interactive video system with dynamic video object descriptors. As shown in Figure 3, the video object descriptor 60 includes an attribute part 62 that includes ID positive, shape, size, layering, duration, action, and action parameters. However, as admitted in the Office Action, the '715 patent fails to disclose extracting feature data of a background area from a frame, as recited in Claim 9. Moreover, Applicants respectfully submit that the '715 patent fails to disclose extracting feature data of a predetermined object *including an affine transformation coefficient of an area of the predetermined object*, as recited in amended Claim 9.

The '901 patent is directed to an image processing apparatus and method in which image data is divided into a background portion and a foreground portion by the calculation of a moving vector for each block in a frame. As shown in Figure 6 of the '901 patent, a moving vector 601 of the background portion and a moving vector 602 of the foreground portion are respectively calculated among sequential frames. However, Applicants respectfully submit that the '901 patent fails to disclose that *an affine transformation coefficient of an area of a predetermined object* is extracted from a frame of an input video, as recited in amended Claim 9. The '901 patent is silent regarding affine transformations.

The '263 patent is directed to a multimedia content description framework for describing multimedia content. However, Applicants respectfully submit that the '263 patent fails to disclose feature data of a predetermined object *including an affine transformation coefficient of an area of the predetermined object*, as recited in amended Claim 9. The '263 patent is silent regarding affine transformations.

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Thus, no matter how the teachings of the '715, '901, and '263 patents are combined, the combination does not teach or suggest extracting or describing feature data of a predetermined object *including an affine transformation coefficient of an area of the predetermined object*, as recited in amended Claim 9. Accordingly, Applicants respectfully submit that Claim 9 (and dependent Claims 10-13, 21, and 22) patentably define over any proper combination of the '715, '901, and '263 patents.
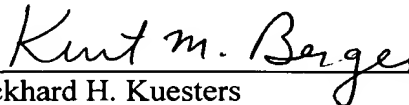
Claim 14 recites limitations analogous to the limitations recited in Claim 9. Moreover, Claim 14 has been amended in a manner analogous to the amendment to Claim 9. Accordingly, for the reasons stated above for the patentability of Claim 9, Applicants respectfully submit that the rejection of Claim 14 (and dependent Claims 23 and 24) is rendered moot by the present amendment to Claim 14.

Thus, it is respectfully submitted that independent Claims 9 and 14 (and all associated dependent claims) patentably define over any proper combination of the '715, '901, and '263 patents.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

Eckhard H. Kuesters
Attorney of Record
Registration No. 28,870
Kurt M. Berger, Ph.D.
Registration No. 51,461

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 08/03)
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